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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

C&SM INTL, a South Korean
Corporation

Plaintiff,

v.

BLUELANS INC., a California
Corporation; FAN YANG, an
Individual; WEIHUA YUAN, an
Individual; and DOES 1-10, inclusive,

Defendants.

Case No: 2:25-cv-5657

PLAINTIFF'S COMPLAINT FOR:

- 1. COPYRIGHT INFRINGEMENT**
- 2. VICARIOUS COPYRIGHT
AND/OR CONTRIBUTORY
COPYRIGHT INFRINGEMENT**

Jury Trial Demanded

Plaintiff C&SM INTL ("Plaintiff"), by and through its undersigned counsel,
hereby prays to this honorable Court for relief and remedy based on the following:

INTRODUCTION

This is an action for copyright infringement under Section 501 of the Copyright
Act. This action arises out of the Defendants' unauthorized
reproduction/modification and sale of copyrighted fabric designs owned and

1 registered by Plaintiff. Plaintiff is the exclusive owner of unique, two-dimensional,
2 graphic artwork titled KAY2737P.

3
4 Plaintiff acquires ownership of the artworks by creating it or purchasing it from
5 other designers and artists. Plaintiff spends a considerable amount of time and
6 resources creating and obtaining high quality, marketable, and aesthetically
7 appealing designs. Plaintiff prints the artworks onto fabric which it then widely
8 sells and disseminates to the apparel industry, for generating profits. It is necessary
9 for the Plaintiff to widely disseminate samples of fabrics to the prospective
10 customer, potentially including DOE defendants, to receive purchase orders from
11 them. When distributing those samples, potential buyers agree not to reproduce,
12 modify, or seek another's reproduction of the artwork appearing on the samples
13 because such reproduction or modification would significantly depreciate the value
14 of Plaintiff's textile business, which has been hard-earned by investing
15 considerable time and resources in acquiring exclusive ownership of the artworks.

16
17 Accordingly, Plaintiff seeks remedy and relief for the damages for direct,
18 vicarious, and contributory copyright infringement arising out of Defendants'
19 unauthorized reproduction and/or modification and sale of copyrighted fabric
20 designs under the Copyright Act of the United States, as amended, 17 U.S.C. § 101
21 *et seq.*

22 23 **JURISDICTION AND VENUE**

- 24 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C. § 101 *et*
25 *seq.*
- 26 2. This Court has federal question jurisdiction under 28 U.S.C. §§ 1331, 1338(a)
27 and (b).

- 1 3. Venue in this judicial district is proper under 28 U.S.C. §§ 1391(c) and 1400(a)
2 in that this is the judicial district in which a substantial part of the acts and
3 omissions giving rise to the claims occurred.

4
5 **PARTIES**

- 6 4. Plaintiff C&SM INTL is a corporation organized and existing under the laws of
7 South Korea with its principal place of business located in South Korea.
- 8 5. Plaintiff is informed and believes and thereon alleges that Defendant
9 BLUELANS INC. (“BLUELANS”) is a California Corporation, with its
10 principal place of business at 17788 Rowland St., Unit A, City of Industry, CA
11 91748.
- 12 6. Plaintiff is informed and believes and thereon alleges that FAN YANG
13 (“YANG”) is, and at all relevant times was, an individual residing in California,
14 and the sole owner, officer, and/or managing agent of BLUELANS, which
15 maintains its principal place of business at 17788 Rowland St., Unit A, City of
16 Industry, CA 91748.
- 17 7. Plaintiff is informed and believes and thereon alleges that WEIHUA YUAN
18 (“YUAN”) is, and at all relevant times was, an individual residing in California,
19 and the sole owner, officer, and/or managing agent of BLUELANS, which
20 maintains its principal place of business at 17788 Rowland St., Unit A, City of
21 Industry, CA 91748.
- 22 8. Plaintiff is informed and believes and thereon alleges that some of DOES 1
23 through 3 are manufacturers and/or vendors of garments supplied to
24 Defendants. These DOE Defendants have manufactured and/or supplied, and
25 continue to manufacture and/or supply, garments containing fabrics printed
26 with Plaintiff’s copyrighted design (as hereinafter defined) without Plaintiff’s
27 knowledge or consent, or have otherwise contributed to the infringement. The
28 true names and capacities of these DOE Defendants, whether corporate,

individual, or otherwise, are presently unknown to Plaintiff, who therefore sues them under fictitious names and will seek leave to amend this Complaint to reflect their actual names and capacities when they are ascertained.

9. Plaintiff is informed and believes, and thereon alleges that DOES 4 through 10 are other parties not yet identified who have infringed Plaintiff's copyrights, contributed to the infringement, or engaged in other wrongful acts as alleged herein. The true names and capacities of these DOE Defendants, whether corporate, individual, or otherwise, are presently unknown to Plaintiff, who therefore sues them under fictitious names and will seek leave to amend this Complaint to reflect their actual names and capacities when they are ascertained.

10. Plaintiff is informed and believes, and thereon alleges that each DOE Defendant is responsible, in some manner, for the events alleged herein and for the damages resulting therefrom.

11. Plaintiff is informed and believes, and thereon alleges that at all relevant times, each Defendant acted in concert with the others and was an agent, affiliate, officer, director, manager, principal, alter ego, and/or employee of the remaining Defendants. Each Defendant acted within the scope of such agency, affiliation, alter-ego relationship, and/or employment, and actively participated in, ratified, or adopted—either before or after the fact—the acts alleged herein, with full knowledge of all relevant facts and circumstances, including, without limitation, the violations of Plaintiff's rights and the damages caused thereby.

CLAIMS RELATED TO DESIGN "KAY2737P"

12. Prior to the acts complained of herein, Plaintiff created all elements of an original two-dimensional artwork for fabric printing, titled "KAY2737P" (hereinafter, "Subject Design"), which is attached hereto as **Exhibit A**.

1 13.Plaintiff is the exclusive owner and author of the originally created artwork
2 titled "KAY2737P," which has been duly registered with the United States
3 Copyright Office under Registration Number Vau 1-273-274 (attached hereto as
4 **Exhibit B**).

5 14.Prior to the acts complained of herein, fabric bearing the Subject Design had
6 been widely disseminated and sold to numerous entities in the fashion and
7 apparel industries.

8 15.Plaintiff has never authorized Defendants to copy, reproduce, duplicate,
9 distribute, disseminate, or create derivative works based on the Subject Design.

10 16.Following the distribution of the Subject Design, Plaintiff is informed and
11 believes, and thereon alleges that BLUELANS, DOE Defendants, and each of
12 them, had access to the Subject Design through various means, including, but
13 not limited to: (a) access to Plaintiff's showroom and/or design library; (b)
14 access to illegally distributed copies of the Subject Design by third-party
15 vendors and/or DOE Defendants, including, but not limited to, international
16 and/or overseas converters and printing mills; (c) access to Plaintiff's strike-offs
17 and samples; and (d) access to garments in the marketplace manufactured with
18 lawfully printed fabric bearing the Subject Design.

19 17.Plaintiff is informed and believes and thereon alleges that BLUELANS, DOE
20 Defendants, and each of them created, manufactured, caused to be
21 manufactured, imported, distributed, marketed, advertised, and/or sold fabric
22 and/or garments comprised of fabric featuring a design incorporating a design
23 that is identical or substantially similar to the Subject Design ("Infringing
24 Garment"). The Infringing Garment includes, but is not limited to, garments
25 bearing Subject Design, which have been sold through online and/or offline
26 retail channels operated by BLUELANS, and DOE Defendants. An exemplar of
27 Infringing Garment is attached hereto as **Exhibit C**.
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1 18.Plaintiff is informed and believes, and thereon alleges, that Defendants YANG
2 and YUAN, as the principal owner and/or controlling officer of BLUELANS,
3 had direct control over, authorized, and/or knowingly participated in its
4 business operations and transactions, including the procurement,
5 manufacturing, importation, marketing, advertising, sale, and distribution—both
6 online and offline—of fabric and/or garments incorporating a design that is
7 identical or substantially similar to the Subject Design, without Plaintiff's
8 authorization.

9 19.Plaintiff further alleges that YANG and YUAN had the right and ability to
10 supervise, and not only directly or indirectly benefited from, but also facilitated
11 and enabled the infringing activities carried out by BLUELANS. By virtue of
12 their position and authority, YANG and YUAN knew or should have known of
13 the infringing activities and failed to take any action to prevent them, thereby
14 making their personally liable for copyright infringement.

15 **FIRST CLAIM FOR RELIEF**

16 (For Copyright Infringement – Against all Defendants, and Each)

17 20.Plaintiff repeats, realleges and incorporates herein by reference as though fully
18 set forth the allegations contained in preceding paragraphs of this Complaint.

19 21.Plaintiff is informed and believes and thereon alleges that Defendants, and each
20 of them, accessed the Subject Design through, without limitation, the following:
21 (a) access to Plaintiff's design library; (b) access to authorized or unauthorized
22 reproductions in the possession of other vendors and/or DOE Defendants; and
23 (c) access to Plaintiff's strike-offs, swatches, paper CADs and samples.

24 22.Plaintiff is informed and believes and thereon alleges that Defendants, and each
25 of them, infringed Plaintiff's copyright by importing, creating, marketing,
26 advertising, making, and/or developing directly infringing and/or derivative
27 works from the Subject Design and by importing, producing, distributing and/or
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1 selling infringing garments through a nationwide network of retail stores,
2 catalogues, and online websites.

3 23. Due to Defendants' acts of infringement, Plaintiff has suffered substantial
4 damages to its business in an amount to be established at trial.

5 24. Due to Defendants' acts of infringement, Plaintiff has suffered general and
6 special damages in an amount to be established at trial.

7 25. Due to Defendants' acts of copyright infringement as alleged herein,
8 Defendants, and each of them, have obtained direct and indirect profits they
9 would not otherwise have realized but for their infringement of the Subject
10 Design. As such, Plaintiff is entitled to disgorgement of Defendants' profits
11 directly and indirectly attributable to Defendants' infringement of the Subject
12 Design in an amount to be established at trial.

13 26. Plaintiff is informed and believes and thereon alleges that Defendants, and each
14 of them, have committed acts of infringement alleged above with actual or
15 constructive knowledge of Plaintiff's rights such that Plaintiff is entitled to a
16 finding of willful infringement, which further subjects Defendants, and each of
17 them, to liability for statutory damages under Section 504(c)(2) of the
18 Copyright Act in the sum of up to \$150,000.00 per infringement. Within the
19 time permitted by law, Plaintiff will make its selection between actual damages
20 and statutory damages.

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22 **SECOND CLAIM FOR RELIEF**

23 (For Vicarious and/or Contributory Copyright Infringement – Against All
24 Defendants)

25 27. Plaintiff repeats, re-alleges and incorporates herein by reference as though fully
26 set forth the allegations contained in the preceding paragraphs of this
27 Complaint.
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1 28.Plaintiff is informed and believes and thereon alleges that Defendants, and each
2 of them, knowingly induced, participated in, aided and abetted in and
3 resultantly profited from the illegal reproduction, importation, purchase,
4 marketing, advertisement, distribution and/or subsequent sales of Infringing
5 Garment featuring the Subject Design as alleged herein above.

6 29.Plaintiff is informed and believes and thereon alleges that Defendants, and each
7 of them, are vicariously liable for the infringement alleged herein because they
8 had the right and ability to supervise the infringing conduct and because they
9 had a direct financial interest in the infringing product.

10 30.By reason of the Defendants', and each of their, acts of contributory and/or
11 vicarious infringement as alleged above, Plaintiff has suffered and will continue
12 to suffer substantial damages to its business in an amount to be established at
13 trial, as well as additional general and special damages in an amount to be
14 established at trial.

15 31.Due to Defendants' acts of contributory and/or vicarious copyright infringement
16 as alleged herein, Defendants, and each of them, have obtained direct and
17 indirect profits they would have not otherwise realized but for their
18 infringement of the Subject Design. As such, Plaintiff is entitled to
19 disgorgement of Defendants' profits directly and indirectly attributable to
20 Defendants' infringement of the Subject Design, an amount to be established at
21 trial.

22 32.Plaintiff is informed and believes and thereon alleges that Defendants, and each
23 of them, have committed acts of infringement alleged herein with actual or
24 constructive knowledge of Plaintiff's rights such that Plaintiff is entitled to a
25 finding of willful infringement, which further subjects Defendants, and each of
26 them, to liability for statutory damages under Section 504(c)(2) of the
27 Copyright Act in the sum of up to \$150,000.00 per infringement. Within the
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1 time permitted by law, Plaintiff will make its selection between actual damages
2 and statutory damages.

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4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff prays for judgment as follows:

6
7 **Against All Defendants**

8 With respect to Each Claim for Relief:

- 9 1. That Defendants, each of them, along with their agents and servants be enjoined
10 from infringing Plaintiff's copyrights in any manner;
11 2. That Plaintiff be awarded all profits of Defendants plus all losses of Plaintiff,
12 the exact sum to be proven at time of trial, or, if elected before final judgment,
13 statutory damages as available under the Copyright Act, 17 U.S.C. § 101 *et*
14 *seq.*;
15 3. That Plaintiff be awarded its attorneys' fees as available under the Copyright
16 Act, 17 U.S.C. § 101 *et seq.*;
17 4. That Plaintiff be awarded pre-judgment interest as allowed by law;
18 5. That Plaintiff be awarded costs of litigation; and
19 6. That Plaintiff be awarded such further legal and equitable relief as the Court
20 deems proper.

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22 **DEMAND FOR TRIAL BY JURY**

23 Plaintiff hereby demands a trial by jury on all issues in this action pursuant to
24 Federal Rule of Civil Procedure 38 and the Seventh Amendment of the United
25 States Constitution.

1 Dated: June 21, 2025

2 Respectfully submitted,

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5 /s/ Jeonghye Kim

6 Jeonghye Kim, Esq.

7 Attorney for Plaintiff
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